

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TARIQ BHATTI)
)
Plaintiff,) C.A. No.: 05-690 (KAJ)
)
)
v.) TRIAL BY JURY DEMANDED
)
J.P. MORGAN CHASE, a Delaware)
Corporation,)
)
Defendant.)

TO: Teresa A. Cheek, Esquire
 Young, Conaway, Stargatt & Taylor
 1000 West Street, 17th Floor
 P.O. Box 391
 Wilmington, DE 19899

NOTICE OF 30 (b)(6) DEPOSITION DUCES TECUM*

PLEASE TAKE NOTICE, that pursuant to the provisions of Rule 30(b)(6),
Federal Rules of Civil Procedure, the defendants, are to designate the appropriate
personnel most knowledgeable to testify as to all reasons why the plaintiff was not
accepted in his application for job requisition number 3001636 for a deposition to be
taken on August 22, 2007 beginning at 1:00 p.m. at the offices of Aber, Goldlust, Baker
& Over, Suite 600, First Federal Plaza, 702 King Street, Wilmington, DE 19801.

*The designated witness shall bring with him/her all documents relevant to, pertaining
to, or mentioning the referenced job requisitions, the applicants for such positions,
and/or documents relating to the factual basis for not awarding the position to the
plaintiff.

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber.
GARY W. ABER (DSB #754)
First Federal Plaza, Suite 600
702 King Street, P.O. Box 1675
Wilmington, DE 19899
302-472-4900
Attorney for Plaintiff

DATED: July 26, 2007

CERTIFICATE OF SERVICE

This certifies that the undersigned served two copies of the attached pleadings by hand delivery to the below-named Counsel, on July 26, 2007:

Teresa A. Cheek, Esquire
Young, Conaway, Stargatt & Taylor
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899

/s/ Melissa A. Chionchio
Melissa A. Chionchio
Secretary to
Gary W. Aber, Esquire